

EXHIBIT 8

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

IN RE: CAPITAL ONE CONSUMER)	
DATA SECURITY BREACH LITIGATION)	MDL No. 1:19md2915 (AJT/JFA)
_____)	

This Document Relates to the Consumer Cases

**DECLARATION OF GERALD THOMPSON ON BEHALF OF PROPOSED PROVIDER
OF IDENTITY DEFENSE SERVICES AND RESTORATION SERVICES**

I, Gerald Thompson, declare as follows:

1. I am the Executive Vice President Global Cyber Group for Intersections, LLC d/b/a Pango (“Pango”). I have worked at Pango since 2015 and am intimately familiar with the company and its products. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto. I submit this Declaration in support of Plaintiffs’ Motion for Preliminary Approval and to Direct Notice of Proposed Settlement to The Class.

2. Intersections, LLC was founded in 1995 as Intersections Inc. and was one of the first companies to offer identity protection and remediation to consumers in the United States. Since that time, Pango under white label brands and through its own brands, has protected more than 47 million citizens in the United States and more than 2.2 million families. Pango has distributed its services through a focused distribution network of large U.S. financial institutions and large enterprise companies since its founding, and has serviced both large and small data breach populations over the past 14 years.

3. Pango is a long-standing, well capitalized, and experienced company that is fully capable of providing the services. Companies choose Pango because Pango has the requisite experience and knowledge to service any breach population with seamless onboarding, excellent

customer service, and attention to detail. Since 2010, Pango has serviced more than 1,700 data breaches for large and small businesses. In 2021 the company serviced some of the largest data breach incidents including 2 national health care providers and was awarded the 3 largest data breach contracts for servicing affected consumers.

4. Pango is willing and able to be appointed by the Court as the provider of Identity Defense Services and Restoration Services, as those terms are defined in the Proposed Consumer Settlement Benefits Plan. For Identity Defense Services, Pango will provide Settlement Class Members a service called Identity Defense Plus. This service provides the following features to detect and remediate potential identity theft and fraud:

- Dark web monitoring for your Social Security number, date of birth, address, driver's license number, passport number, payment cards, e-mail address, and other information;
- Identity monitoring with authentication alerts;
- Lost wallet protection;
- Security freeze capability in multiple categories: Credit – Experian, Equifax, TransUnion and Innovis; Specialty Finance – Sage Stream, Clarity DATAx and CoreLogic; Closed Checking and Savings accounts – Chex Systems; and Utilities – NCTUE
- \$1 million dollars in no-deductible insurance provided by a third-party insurer to cover certain costs related to identity theft or fraud;
- U.S.-based customer support specially trained in identity theft and fraud discovery and remediation; and
- Insight & tips for members on the user dashboard.

5. In addition, a more comprehensive service, Identity Defense Total, will be provided by Pango to Settlement Class Members whose Social Security number or linked bank account number was accessed in the Data Breach. This service includes all of the benefits of Identity Defense Plus, with the following features: credit monitoring from all three credit bureaus and a Monthly Credit Score.

6. The retail cost of buying the same Identity Defense Services would be \$60.00 per person per year for Identity Defense Plus service and \$180.00 per person per year for Identity Defense Total service.

7. Pango will provide these services for at least 38 months after the Effective Date (as that term is defined by the Settlement) to all Settlement Class Members who timely make a claim for the services or who seek to enroll directly with Pango during the period of the services.

8. Pango will also make available to all Settlement Class Members, even those who do not enroll Identity Defense Services or do not submit a claim, a Restoration Service for at least three years. The Restoration Service will give Settlement Class Members fraud resolution and identity restoration support. This coverage is a separate benefit and gives all Settlement Class Members access to Pango's specifically trained U.S.-based fraud resolution specialists who can assist with important tasks such as placing fraud alerts with the credit bureaus, disputing inaccurate information on credit reports, scheduling calls with creditors and other service providers, and working with law enforcement and government agencies to dispute fraudulent information.

9. If requested by Settlement Class Counsel to extend the two Services using funds that are remaining from the Settlement Fund, Pango will provide additional Identity Defense Services and Restoration Services for an extended period which shall be determined by the amount of money left in the Settlement Fund that is allocated for this purpose. Settlement Class Members will be entitled to enroll in Identity Defense Services (and to access Restoration Services) throughout the period of any extension of service.

10. At the end of the service period, Pango will not automatically extend the services to Settlement Class Members. No later than 30 days before the end of the services, Pango will contact the enrolled Settlement Class Members to inform them that the services will terminate.

11. Pango will provide Settlement Class Counsel with quarterly updates as to the number of Settlement Class Members who have enrolled in Identity Defense Services.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 31st day of January, 2022, in New Jersey.

Gerald Thompson

Gerald Thompson
Executive Vice President Global Cyber Group
Intersections, LLC d/b/a Pango